

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**

GLOBAL PLASMA SOLUTIONS, INC.,

*Plaintiff,*

v.

ELSEVIER INC. and ELSEVIER LTD.,

*Defendants.*

Civil Action No. 3:22-cv-00034

**PLAINTIFF GLOBAL PLASMA SOLUTIONS, INC.'S MOTION TO STRIKE OR  
DISREGARD THE THIRD DECLARATION OF WILLIAM S. STRONG AND  
EXHIBITS THERETO**

Plaintiff Global Plasma Solutions, Inc. (“GPS”) hereby moves this Court, pursuant to its inherent authority, to strike or disregard the Third Declaration of William S. Strong and exhibits thereto (Doc. Nos. 82-1 to 82-4) filed by Elsevier Ltd. and Elsevier Inc. (collectively, “Elsevier”) in support of Elsevier’s objections to the Honorable David C. Keesler’s Memorandum and Recommendation on Elsevier’s Rule 12(b)(6) motion to dismiss for failure to state a claim.

Pursuant to Local Rule 7.1(b), counsel for GPS contacted counsel for Elsevier regarding the instant motion at 10:27 a.m. EST on July 10, 2024. As of the time of filing this motion, counsel for GPS has not heard from Elsevier’s counsel. This motion is supported by the accompanying brief in support, filed contemporaneously herewith.

Dated: July 10, 2024

**McGUIREWOODS LLP**

By: /s/ Robert A. Muckenfuss

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*Attorneys for Plaintiff Global Plasma Solutions, Inc.*

#### **CERTIFICATE OF SERVICE**

I hereby certify that on this 10th day of July, 2024, the foregoing **PLAINTIFF GLOBAL PLASMA SOLUTIONS, INC.'S MOTION TO STRIKE OR DISREGARD THE THIRD DECLARATION OF WILLIAM S. STRONG AND EXHIBITS THERETO** was filed electronically with the Clerk of Court for the Western District of North Carolina by using the CM/ECF system. Counsel for all parties in this case are registered CM/ECF users and will be served by the CM/ECF system.

/s/ Robert A. Muckenfuss  
Robert A. Muckenfuss (SBN #28218)